

Bruce W. Radowitz, Esq
636 Chestnut Street
Union, New Jersey 07083
(908) 687-2333
BRUCE W. RADOWITZ, ESQ.
Attorney for Debtor

In the matter of:

ANTERO B. GONZALEZ, JR.
Debtor(s)

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

Case No: 18-15827/KCF
Chapter 13

**DEBTOR'S RESPONSE TO TRUSTEE'S
OBJECTION TO CHAPTER 13 PLAN**

**TO: HONORABLE KATHERINE C. FERGUSON
UNITED STATES BANKRUPTCY JUDGE**

Your applicant, Antero B. Gonzalez, Jr. Debtor(s) herein, by and through his attorney, Bruce W. Radowitz, Esq, respectfully represent:

1. Debtor(s) filed a Chapter 13 Bankruptcy on March 26, 2018.
2. The Debtor(s) 341(A) Meeting of Creditors was held on August 30, 2018.
3. The Confirmation Hearing is scheduled for September 12, 2018.
4. The Chapter 13 Trustee filed an Objection to Debtor(s) Chapter 13 Plan.
5. The following objections are unnecessary as the debtor is obligated to provide a 100% dividend.
 - a) **A current market analysis - on two parcels of real property in Freehold, NJ and Manilla Philippines property.**
 - b) **COPY OF CONTRACT FOR FREEHOLD PTY ;
FORCLOSURE DEED FOR MANILLA PTY**
 - c) **A copy of the deed - Manilla Philippines property**
 - d) **The debtor(s) plan consists of unnecessary or excessive expense items, such as: Schedule J list child's education cost \$800, Life**

insurance \$500 (requires proof), health insurance \$750 (requires proof) and estimated income tax payment \$750 (requires proof). Proof only required if not paying 100% to gucs.

- f) The Plan provides for payment on unsecured claims of less than that which would be distributed upon liquidation under Chapter 7, as prohibited by 11 U.S.C. § 1325(a)(4): There is non-exempt equity on real property on South St \$359,379.96 and Sunnyside Rd which is being surrendered for \$99,528..04. Plan is paying 100% would need to confirm 100% with non-exempt equity.**
- g) Need New York Life insurance statement with value and agreement with Eduardo Vidal on 2 parcels of real property in Freehold, NJ.**

6. All other information raised in the trustee's objection shall be responded in a timely fashion.

Respectfully submitted,

Attorneys for Debtor

/s/ BRUCE W. RADOWITZ, ESQ.